

Ackerman, Joyce

From: Stovall - CDPHE, Curtis <curtis.stovall@state.co.us>
Sent: Tuesday, April 3, 2018 7:57 AM
To: Dave Folkes
Cc: Ackerman, Joyce; Walker - CDPHE, David; Richard Dean; Jonathan H. Steeler; Jackie Rowley; jason.king@coag.gov; MacGregor - CDPHE, Kelly
Subject: Re: Phase 2B gravel layer

Dave,

CDPHE approves your plan for constructing a gravel layer in Phase 2B for potential use during future remedial action. The details of the plan are described in your emails dated April 1 and April 2, 2018, and shown on two figures provided with your April 1, 2018 email.

CDPHE understands that Stratus will be submitting to EPA, under separate cover, a written request for approval to backfill the Phase 2B and Phase 3 excavations, which CDPHE will be copied on. Stratus will construct the gravel layer and backfill the pits once the written request is approved by EPA.

Following construction of the Phase 2B gravel layer, CDPHE requires Stratus to prepare and submit to CDPHE as-built details of the project, to include details such as product specifications, material quantities, representative photos, etc. The construction summary must include as-built drawing(s), based on surveying. The as-built details can be submitted to CDPHE as part of one or more of the CMS-related documents.

Thanks,
Curt

On Mon, Apr 2, 2018 at 11:18 AM, Dave Folkes <DFolkes@geosyntec.com> wrote:

Hi Curt, thanks for your quick review:

1. We were planning to put the separation fabric on the top and sides of the gravel (TerraTex®N08) and placing a geogrid (TerraGrid®RX1200 - 1" x 1.3" apertures) on the bottom, to limit punching of the gravel into the subgrade. We were concerned about the potential for a bottom fabric to block up over time, and the resultant reduction in the rate of reagent exfiltration. What do you think?
2. OK – backfill will be placed to within 2.5 feet of final grade to allow room for the final cover.
3. Understood – we will survey the subgrade surface after preparation for gravel placement and the final gravel surface.

Best regards, Dave

From: Stovall - CDPHE, Curtis [<mailto:curtis.stovall@state.co.us>]
Sent: Monday, April 2, 2018 9:44 AM
To: Dave Folkes <DFolkes@Geosyntec.com>
Cc: Ackerman, Joyce <Ackerman.Joyce@epa.gov>; Walker - CDPHE, David <david.walker@state.co.us>; Richard Dean

<rdean@stratuscompanies.com>; Jonathan H. Steeler <JSteeler@sennlaw.com>; Jackie Rowley <JRowley@Geosyntec.com>

Subject: Re: Phase 2B gravel layer

Hi Dave,

We have one question and two comments:

1. Question: Are we correct to assume that the separation fabric will fully encase the gravel (i.e., top, bottom, and sides)?
2. Comment #1: The minimum thickness of final cover that meets regulatory requirements is 2.5 feet.
3. Comment #2: Following construction, we require Stratus to prepare and submit to CDPHE as-built details of the project, to include details such as product specifications, material quantities, representative photos, etc. The construction summary must include as-built drawings, based on surveying. The as-built details can be submitted to CDPHE as part of the CMS.

We can approve your submittal with modifications once we hear back from you. Alternatively, you can revise and resubmit.

Thanks,

Curt

On Sun, Apr 1, 2018 at 7:02 PM, Dave Folkes <DFolkes@geosyntec.com> wrote:

Dear Curt,

As discussed, attached for your review and approval are plan and profile drawings for placing a gravel layer in the bottom of the Phase 2B excavation at the Neuhauser Landfill site, for potential use during future remedial action under the anticipated state order.

The overlying backfill material will consist of onsite soils that do not require removal under the EPA AOC, overlain at a later date by a CDPHE-approved 2 foot soil cover/cap.

Stratus will also be submitting to EPA, under separate cover, a written request for approval to backfill the Phase 2B and Phase 3 excavations, which you will be copied on. Stratus will construct the gravel layer and backfill the pits once this request is approved by EPA.

Please don't hesitate to contact me if you have any questions or concerns.

Best regards, Dave

David J. Folkes, P.E. (CO)

Senior Principal

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Curt Stovall, P.E.
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Solid Waste Permitting Unit
Solid Waste and Materials Management Program



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Hazardous Materials
& Waste Management Division
Department of Public Health & Environment

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